

EXHIBIT No. 3531

(11)

INTERNATIONAL MILITARY TRIBUNAL FOR THE FAR EAST

THE UNITED STATES OF AMERICA, et al

- vs -

ARAKI, Sadao, et al

Sworn Deposition (Translation)

Deponent ; -- MATSUMURA, Shūitsu

Having been duly sworn in accordance with the procedure follow in my country, I do hereby depose and say as follows:

1. I am MATSUMURA, Shūitsu.

My address is Hinaku-cho, Ashikita-gun, Kumamoto-ken.

My birth place is the same as my address.

The date of my birth is 1st Mar., 1900.

As for my education, I

finished 2nd Year Course of the Kumamoto Prefectural Yatsushiro Middle School, graduated from the Kumamoto Local Mil. Prep. School, Tokyo Central Mil. Prep. School, Mil. Academy, Mil. Art. and Engl. School and Mil. Staff College.

As for my appointments, they are as follows:

I Dec. 1920; 2nd Lt., A.

Dec. 1931; Instructor at the Field Art. School.

Jun. 1934; Member of the Press Section of the
Kwantung Army H. Q.

Aug. 1935; Member of the Press Section of the
War Office.

Mar. 1938; Chief of the Press Section of the
Kwantung Army.

Aug. 1938; Member of the Press Section of the
War Office.

Oct. 1938; Member of the Information Bureau of the
War Office.

Dec. 1939; Chief of the Information Bureau of the
War Office. Chief of the Press Bureau of
the Imperial General H.Q.

Dec. 1940; Information official of the Cabinet
Information Bureau.

Oct. 1943; Chief of the Press Bureau of the War Office,
Chief of the Press Bureau of the Imperial
G. H. Q.

Jul. 1945; Chief of Staff of the Chugoku Army District.

At the time when I was a member of the Information Bureau
of the War Office, Colonel Sato, Kenryo was Chief of the
Information Bureau.

2. The Press Section of the War Office was originally started
to look after the Press Club in the compound of the War
Office and its main duty was to provide such news
materials concerning war administration as laws and
ordinances, estimates, announcements of changes of ^{personnel} affairs,

exercises held on the military memorial day, etc.

In 1938, its name was changed to "Information Bureau of the War Office". But the nature of the business was naturally the same as that of the Press Section. As above-mentioned, the Information Bureau of the War Office was not a section recognized as a government organization, but it was coordinate with the Army Affairs Section, Military Affairs Section, etc. of the Military Affairs Bureau and the Chief and the members were under command and supervision of Chief of the Military Affairs Bureau under the jurisdiction of the War Minister.

3. When the Imperial General Headquarters was organized at the outbreak of the China Incident in 1937, the Army Press Bureau of ^{Imperial} I G H Q was established simultaneously. Its chief duty consisted in announcement of the state of military operations (ie. matters concerning military command), so its members including Bureau-Chief were under superintendence and command of the Chief of General Staff and was directed by the Chief of the 2nd Division of the General Staff Office.

However, most members of the Press Bureau of the War Ministry had been concurrently appointed as members of the Army Press Bureau of I G H Q.

4. Therefore, to speak exactly, there were two kinds of announcements of the Army, namely, the one announced by the Information Bureau of the War Ministry and the other by the Press Bureau of Imperial G.H.Q.

So the matters concerning military command such as announcement of state of military operations, etc. was taken care of by the latter while the announcement of ordinances or personnel affairs by the former.

To explain more minutely, that which was prepared by the section in charge to be announced by newspaper was first sanctioned by the related Bureau and then approved by the Vice-minister or Minister of War or the Deputy Chief or the Chief of the General Staff, as the case may be. It depended on the degree of importance or the nature of the matter concerned, i.e., whether it was one of military administration or of military command.

After being so processed, the said announcement was made at the Press Club.

5. Furthermore, the principle of conducting the public opinion was decided at the cabinet conference and in accordance with the principle so decided, each agency took charge of its execution.

To supervise the matters military, particulars of prohibition from newspaper announcement were decided according to the provisions concerning military secrets notified by the Minister and censorship was conducted

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in accordance with the Minister's notice.

6. Since the outbreak of the China Incident, the personnel of the Press Bureau and those of the Military Affairs Section had frequently given lectures for the purpose of explaining the military operations already conducted, the state of occupied territories, the general situation, extermination of rumours and enhancement of national spirit.

On this 22 day of May, 1947

At I.M.T.F.E.

DEPONENT /S/ MATSUMURA, Shuitsu (seal)

I, KUSANO, Hyoichiro, hereby certify that the above statement was sworn by the Deponent, who affixed his signature and seal thereto in the presence of this Witness.

On the same date

At I.M.T.F.E.

Witness: /S/ KUSANO, Hyoichiro (seal)

OATH

In accordance with my conscience I swear to tell the whole truth withholding nothing and adding nothing.

/S/ MATSUMURA, Shuitsu (seal)